

WRITTEN STATEMENT OF SOUTHWEST ARKANSAS TELEPHONE COOPERATIVE

November 3rd, 2014

VIA ECFS

Attn: Glibert Smith Telecommunications Access Policy Division,
Wireline Competition Bureau

Re: WC Docket No. 14-93; Connect America Fund Phase II Challenge
Response

Dear Mr. Smith:

Southwest Arkansas Telephone Cooperative ("SWAT") hereby certifies that SWAT offers qualifying residential fixed voice and broadband services in the 16 Arkansas census blocks set forth on the attached FCC Form 505. SWAT demonstrates that it serves these census blocks using the following evidence; (i) Exhibit A: This written statement of Southwest Arkansas Telephone Cooperative; (ii) Exhibit B: One present customer with GPS coordinates per census block (except census block 050910209001200, which does not have any current customers); (iii) Exhibit C through R: A map of each census block with customer locations identified as points; (iv) Exhibit S – T: Copies of SWAT pricing and performance / network management practices, which show that we meet or exceed the Commission's criteria; (v) Exhibit U: A statement from the SWAT billing supervisor, stating that we currently are billing customers within these census blocks with the exception of 1 census block, 050910209001200 (vi) Exhibit V: A statement from the SWAT VP of Outside Plant, stating that we currently have facilities in place to provide service in the census blocks referenced on the same statement.

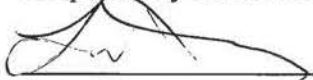
Further SWAT hereby certifies that these census blocks are entirely located within our rate-of-return study area and no portion falls within a price cap study area. SWAT demonstrates this by using the following evidence; (vii) Exhibit W: Relevant SWAT and Windstream study area boundary maps with the census blocks in question identified. Boundary maps are taken from FCC Study Area Boundary Data available online at <http://www.fcc.gov/encyclopedia/study-area-boundary-data-collection>.

1. **Served census blocks:** The attached list of GPS coordinates provide a representative sample of subscribers in the relevant census blocks. Additionally, we have provided a map of these census blocks identifying the location of current subscribers. Additionally, we are providing a statement from our Billing Supervisor certifying that we currently bill subscribers in 16 of the 17 census blocks listed. Finally, we are providing a statement from our VP of OSP certifying that we have facilities in place today to provide service to all 17 of the listed census blocks.
2. **Broadband and Voice service:**
 - a. **Broadband Speed:** The attached performance data and network management disclosure (Exhibit T) confirms that the broadband service we offer in this service area clearly exceeds the FCC's speed thresholds.
 - b. **Broadband Usage Allowance:** The attached performance data and network management disclosure (Exhibit T) as well as pricing and plan data (Exhibit S) confirm that SWAT does not implement caps on usage allowances.
 - c. **Broadband Latency:** The attached performance data and network management disclosure (Exhibit T) confirms that the broadband service we offer in this service area clearly satisfies the FCC's latency thresholds.
 - d. **Broadband and Voice Pricing:** The attached pricing information (Exhibit S) confirms that our residential voice service pricing of \$20.00 and broadband price (4/1) of \$34.95 are far below the FCC benchmarks for maximum costs.
 - e. **Voice Service:** As demonstrated by Southwest Arkansas Telephone Cooperative's FCC Form 477, SWAT provides Voice service within our study area.

In summary, SWAT serves all the Arkansas census blocks included on the FCC form 505 with voice and broadband services that exceed the commission's performance and pricing criteria. Additionally, based on the information on public record, each of these census blocks are entirely within SWAT's rate-of-return service territory.

SWAT is a rural rate of return ILEC providing Voice, Video and Internet services in seven exchanges in Arkansas and one exchange in Texas. More information can be found at <http://www.swat.coop>

Respectfully submitted,



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